

MONTGOMERY MCCrackEN WALKER & RHOADS LLP

(A Limited Liability Partnership Formed in Pennsylvania)

By: John J. Levy, Esquire

LibertyView, Suite 600

457 Haddonfield Road

Cherry Hill, NJ 08002

(856) 488-7700

Attorneys for Respondents Grimaldi Deep Sea S.p.A. and M/V Costa Grande D'Avorio, *in rem*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN THE MATTER OF THE VERIFIED	:	
PETITION OF AMERICAN MARITIME	:	
SERVICES OF NEW YORK TO	:	Civil Action No. 2:23-cv-04109-EP-JRA
PRESERVE EVIDENCE IN AID OF	:	
ANTICIPATED LITIGATION PURSUANT	:	
TO RULE 27 FED. R. CIV. P.	:	
	:	

**NOTICE OF MOTION OF RESPONDENTS GRIMALDI DEEP SEA S.p.A.
AND M/V COSTA GRANDE D'AVORIO, *in rem*, FOR ADMISSION OF
KASPAR KIELLAND, ESQ. *PRO HAC VICE***

TO: All Counsel of Record

PLEASE TAKE NOTICE that on September 18, 2023, at 9:00 a.m. or as soon thereafter as counsel may be heard, Respondents Grimaldi Deep Sea S.p.A. and M/V Costa Grande D'Avorio, *in rem*, by and through their undersigned attorneys, shall move before the Honorable José R. Almonte, United States Magistrate Judge, at the Martin Luther King Building and U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102 for an Order admitting Kaspar Kielland, Esq. *pro hac vice* pursuant to L. Civ. R. 101.1.

In support of this motion, Respondents Grimaldi Deep Sea S.p.A. and M/V Costa Grande D'Avorio, *in rem* will rely upon the accompanying Certification of John J. Levy, Esq., and

Declaration of Kaspar Kielland, Esq., submitted herewith. Pursuant to L. Civ. R. 7.1, no brief is necessary because there are no disputed factual or legal issues. A proposed form of Order is submitted herewith.

MONTGOMERY, McCRACKEN,
WALKER & RHOADS, LLP
Attorneys for Respondents
Grimaldi Deep Sea S.p.A. and
M/V Costa Grande D'Avorio, in rem

Dated: August 22, 2023

By: s/John J. Levy
John J. Levy
jlevy@mmwr.com

CERTIFICATE OF SERVICE

I, John J. Levy, hereby certify that on this date, the foregoing Notice of Motion of Respondents Grimaldi Deep Sea S.p.A. and M/V Costa Grande D'Avorio, *in rem*, for Admission of Kaspar Kielland, Esq. *Pro Hac Vice*, Certification of John J. Levy, Esq. in support, Declaration of Kaspar Kielland, Esq. in support, and proposed form of Order have been served via the Court's CM/ECF system to all counsel of record.

Dated: August 22, 2023

s/John J. Levy
John J. Levy